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September 14, 2021

**By ECF**

Hon. Valerie Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007

USDC SDNY  
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DATE FILED: 9/14/2021

Re: *Patsy Rodenburg v. Chrismatic Studios Corp. et al.* (21 Civ. 07308 (VEC)) – Request to Extend Time to Respond to Complaint and Adjourn Initial Conference

Dear Judge Caproni:

We are counsel to Defendants Chrismatic Studios Corp. d/b/a Michael Howard Studios and Gabrielle Berberich (collectively, “Defendants”). We write with the consent of Plaintiff’s counsel, and pursuant to Rule 2C of Your Honor’s Individual Practices, to respectfully request an extension of time until October 29, 2021 for Defendants to answer or otherwise respond to the complaint.

Our firm accepted service of the complaint by email on September 10, 2021 (without waiving any defenses), with the original response date accordingly falling on October 1, 2021. At the time we accepted service, I explained to Plaintiff’s counsel that I had scheduling conflicts spanning the majority of the month of October, including a scheduled arbitration the first week of October followed by pre-existing travel plans. As noted, Plaintiff’s counsel consents to this request, which is Defendants’ first such request. Since the Initial Pretrial Conference is also currently scheduled for October 29, the parties respectfully request an adjournment of the Initial Pretrial Conference until November 19 or December 3. This is the parties’ first such request.

We thank the court for its consideration of the foregoing requests.

Respectfully submitted,

/s/ Robert A. Giacovas

Robert A. Giacovas

cc: Plaintiff’s Counsel (by ECF)

Application GRANTED IN PART AND DENIED IN PART. Defendants' time to answer, move, or otherwise respond to the complaint is adjourned to **October 29, 2021**.

The initial pretrial conference will take place on **October 29, 2021 at 2:00 p.m.**, as originally scheduled. The parties' joint submission is due by **October 21, 2021**. The parties should appear for the conference by dialing 888-363-4749, using the access code 3121171 and the security code 7308.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

9/14/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE